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Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**ADMINISTRATIVE MOTION OF  
PACIFIC GAS AND ELECTRIC  
COMPANY TO FILE UNDER SEAL  
PORTIONS OF RESPONSE TO  
QUESTIONS FOR FOLLOW-UP**

Judge: Hon. William Alsup

1 Pursuant to Criminal Local Rule 56-1, Pacific Gas and Electric Company  
2 (“PG&E”) respectfully submits this Administrative Motion to File Under Seal (the  
3 “Administrative Motion”).

4 PG&E makes the following statement in support of its Administrative Motion:

5 1. Counsel for PG&E has reviewed and complied with Civil Local Rule 79-5 and  
6 Criminal Local Rule 56-1, which require that if a document or portion thereof is sealable,  
7 counsel seeking to file the document or portion of the document under seal must file and serve an  
8 administrative motion for a sealing order, accompanied by a declaration establishing that the  
9 materials are sealable.

10 2. PG&E seeks to file under seal redacted portions of Exhibits 1 through 15 to the  
11 Declaration of Kate Dyer in Support of PG&E’s Administrative Motion to File Under Seal (the  
12 “Dyer Declaration”), which correspond to Exhibits A and C through P to PG&E’s March 12,  
13 2021 Response to Questions for Follow-Up, respectively. Specifically, PG&E seeks to redact for  
14 safety reasons the names, addresses and contact information of the PG&E employees and  
15 contractors identified in these documents. PG&E further seeks to redact the names, addresses  
16 and contact information of PG&E customers in these documents.

17 3. Criminal Local Rule 56-1 provides that a sealing order may issue where  
18 information, if made available to the public, would compromise the safety of a person. *See*  
19 Criminal Local Rule 56-1(b) and Commentary.

20 4. PG&E believes that the safety of the PG&E employees, contractors and their  
21 family members could be compromised if their names, job titles, and roles are made publicly  
22 available as part of the PG&E Response.

23 5. As set forth in the Dyer Declaration, PG&E has observed a dramatic increase  
24 in the number of workplace violence events from customers towards employees, including  
25 during PSPS events. In addition, PG&E executives who have spoken publicly on behalf of  
26 PG&E with respect to its wildfire mitigation efforts have received death threats.

6. State regulations also limit public disclosure of PG&E customers' personal information, including their names, addresses and contact information. *See, e.g.*, Cal. Civ. Code §§ 1798, et seq. (regulating collection, maintenance and dissemination of personal information by state agencies); Cal. Gov't Code § 6255 (authorizing state agencies to withhold records from disclosure under California Public Records Act where "on the facts of the particular case, the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record"); CPUC Decision No. 14-05-016 (May 5, 2014) at 33-34 (requiring PG&E customer usage data to be made publicly available only in an aggregated, anonymized manner).

7. PG&E seeks to redact the names, addresses and contact information of its customers from the publicly filed version of the PG&E Supplemental Response to maintain consistency with these state regulations and to maintain its customers' privacy.

Dated: March 12, 2021

Respectfully Submitted,

JENNER & BLOCK LLP  
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